

EXHIBIT 17
REDACTED VERSION OF
DOCUMENT SOUGHT TO BE
SEALED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

-----oOo-----

WAYMO LLC,

Plaintiff,

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO LLC; OTTO TRUCKING,

INC.,

Defendants.

/

HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF RADU RADUTA

SAN FRANCISCO, CALIFORNIA

THURSDAY, JULY 13, 2017

THURSDAY, JULY 13, 2017

THURSDAY, JULY 13, 2017

REPORTED BY:

ANDREA M. IGNACIO,

CSR, RPR, CRR, CCRR, CLR ~

CSR LICENSE NO. 9830

JOB NO. 2654630

PAGES 1 - 205

1 Q You are familiar with the GBr3 transmit board 11:04
2 used by Waymo; correct? 11:04

3 A Yes, yeah. 11:04

4 Q I want you to imagine that a GBr3 transmit 11:04
5 board is lying flat on a table. 11:04

6 A Uh-huh. 11:04

7 Q There is a laser die -- the laser dies are 11:04
8 mounted on the upside of the Tx board. 11:04

9 A Sure. 11 : 04

This figure is a horizontal timeline visualization. The vertical axis on the left is labeled with numbers from 1 to 10. Each number corresponds to a horizontal bar. Each bar begins with a small black square and ends with a red circle. The length and position of each bar indicate the duration and timing of the event it represents. The bars are mostly black, except for the first few which have some white space at the start.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

1 Q What do you mean by "slit"? 11:07
2 A Well, the Waymo design used the slit mirror 11:07
3 to combine the Rx and the Tx paths at a certain point. 11:07
4 So, that means that the light coming off of the Tx 11:07
5 boards was all crossing through this narrow slit in 11:07
6 the mirror before going to the main lens. 11:07
7 [REDACTED] [REDACTED]
[REDACTED] [REDACTED] 11:08
17 A Uh-huh. 11:08
18 Q Can you give a verbal yes-or-no answer? 11:08
19 A Yes. 11:08
20 Q So, just to try it again -- sorry -- in 11:08
21 GBr3 -- 11:08
22 A Yes. 11:08
23 [REDACTED] [REDACTED]
[REDACTED] [REDACTED] 11:08
25 A As the -- as the device is normally oriented 11:08

1 when it's operating, yeah. I mean, most of the time I 11:08
2 saw them laid on their side, but, you know, yes. So 11:08
3 there -- there are [REDACTED]. 11:08
4 [REDACTED] [REDACTED]
[REDACTED] [REDACTED] 11:10

1 [REDACTED] [REDACTED]
2 [REDACTED]
3 [REDACTED] [REDACTED]
4 [REDACTED] [REDACTED]
5 [REDACTED]
6 [REDACTED] [REDACTED]
7 [REDACTED] [REDACTED]
8 [REDACTED] [REDACTED]
9 [REDACTED] [REDACTED] 11:10
10 A Yes. We've been through that a couple of 11:10
11 times now. 11:10
12 THE REPORTER: I'm sorry. Your hands. 11:10
13 THE WITNESS: Sorry. 11:10
14 We've been through that a couple of times 11:10
15 now, yes. 11:10
16 MR. NARDINELLI: How are you doing on time? 11:10
17 Do you need a break? We've been going for a little 11:10
18 bit. It's all up to you. 11:10
19 THE WITNESS: I'm good. 11:10
20 MR. NARDINELLI: You can put that exhibit 11:11
21 away. 11:11
22 Marking the next exhibit. 11:11
23 THE VIDEOGRAPHER: Exhibit 298. 11:11
24 (Document marked Exhibit 298 11:11
25 for identification.) 11:11

1 CERTIFICATE OF REPORTER
2

3 I, ANDREA M. IGNACIO, hereby certify that the
4 witness in the foregoing deposition was by me duly
5 sworn to tell the truth, the whole truth, and nothing
but the truth in the within-entitled cause;

6 That said deposition was taken in shorthand
7 by me, a disinterested person, at the time and place
8 therein stated, and that the testimony of the said
9 witness was thereafter reduced to typewriting, by
10 computer, under my direction and supervision;

11 That before completion of the deposition,
12 review of the transcript [x] was [] was not
13 requested. If requested, any changes made by the
deponent (and provided to the reporter) during the
period allowed are appended hereto.

14 I further certify that I am not of counsel or
15 attorney for either or any of the parties to the said
16 deposition, nor in any way interested in the event of
this cause, and that I am not related to any of the
17 parties thereto.

18 Dated: July 14, 2017
19
20
21



22
23
24 ANDREA M. IGNACIO,
25 RPR, CRR, CCRR, CLR, CSR No. 9830